

# Who ?

## PCB impaired waters

- **Majors**
- **CSOs**
- **Minors (screening for municipals?)**
- **Industrial stormwater outfalls**
- **MS4**
- **Mining outfalls**
- **Non-contact cooling waters**

# **Potential sources**

## **- industrial / commercial -**

<b>SIC Code</b>	<b>Code Name Facility</b>
<b>26</b>	<b>Paper and Allied Products</b>
<b>30</b>	<b>Rubber and Misc. Plastics</b>
<b>33</b>	<b>Primary Metal Industries</b>
<b>34</b>	<b>Fabricated Metal Products</b>
<b>37</b>	<b>Transportation Equipment</b>
<b>49</b>	<b>Electrical, Gas and Sanitary Services</b>
<b>1221 &amp; 1222</b>	<b>Bituminous Coal</b>

# When ?

- **Monitoring**
  - **Strategy w/n 2 yrs of TMDL**
  - **VPDES**
- **How**
  - **frequent**
  - **long**

# Frequency ?

- **# of samples**
  - wet (high)
  - dry (base)
- **Type & size**
  - Major
  - Minor
  - Industrial stormwater
  - CSO (wet only)

# **Sample Method**

- 1. EPA Method 1668A – composite samples**
- 2. EPA Method 1668A – grab samples**
- 3. Semi-Permeable Membrane Device (SPMD)**

# Costs

- Laboratories (list will be available)
- Sample Collection (24h composites)
  - Clean technique (cost ?)
- Method 1668A Cost
  - \$700 – \$1,200 per sample
  - Greater number of samples < \$\$
- SPMD (estimated)
  - \$450-\$500 per SPMD
    - Includes clean-up and extraction
  - Plus Cost of Analysis
- Additional Parameters - TOC, POC, DOC, TSS

**How?**

# How?

## **1. Voluntary monitoring program**

- Initial round of Potomac discharger PCB sampling**
- Initiate immediately**
- May not reach all dischargers**
- Coordinate with TAC, VAMWA, VMA**
- Cost savings**

## **2. Via VPDES Permit condition**

- Would have to wait VPDES permit is modified/reissued**



# How?

## 3. Require by letter via 9 VAC 25-31-190.H.

### *H. Duty to Provide Information*

*The permittee shall furnish to the department, within a reasonable time, any information which the board may request to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. The board may require the permittee to furnish, upon request, such plans, specifications, and other pertinent information as may be necessary to determine the effect of the wastes from his discharge on the quality of state waters, or such other information as may be necessary to accomplish the purposes of the law. The permittee shall also furnish to the department upon request, copies of records required to be kept by the permit.*

- **Used infrequently**
- **Initiate immediately**

# Implementation Concerns

- TMDL will include wasteload allocations for significant sources
- **WLAs ? Effluent Limitations**
- Likely rely on “Pollution Minimization Plans” rather than effluent limitations
- Others?